



September 29, 2014

Mr. J. Keith Gilles, Chair
California Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460

**RE: Comments on “Forest Fire Prevention Pilot Project Exemption”
Proposed Revisions to Slash Treatment Requirements**

Dear Chair Gilles:

The Rural County Representatives of California (RCRC) represents thirty-four California counties statewide. Our Board of Directors consists of an elected Supervisor from each of our member counties. As you know, forest management and fuels reduction projects to help prevent catastrophic wildfires are of paramount importance to our member counties. California’s forests and forest communities are under severe threat of catastrophic wildfire due to the on-going drought, a warming climate, and years of over-growth due to lack of sustainable forest management. In light of that, RCRC offers our support for the proposed revisions to the slash treatment requirements for the “Forest Fire Prevention Pilot Project Exemption” (Pilot Project Exemption), and also encourages the Board to adopt the change to the rule that includes the coastal counties as authorized by AB 2142.

RCRC supports the provisions in the proposed revision to increase the maximum allowed post-logging slash height from 9 inches to 18 inches, and to modify the timing for slash treatments for operations that occur later in the season. One of the main barriers for landowners to participate in the Pilot Project Exemption is the liability over the removal of slash. The vast majority of this material will be removed and piled at landings because biomass markets are not available in many areas in need of thinning. Disposal of the slash material created by the thinning projects is currently a significant cost barrier to landowners that would otherwise participate in the Pilot Project.

Imposing the additional standard to lop remaining slash to a 9-inch depth would prevent many landowners from utilizing this Pilot Project Exemption. An 18-inch maximum slash depth standard combined with a lengthier time period to burn or otherwise dispose of the piles will reduce treatment costs and create flexibility to ensure

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ALPINE AMADOR BUTTE CALAVERAS COLUSA DEL NORTE EL DORADO GLENN HUMBOLDT IMPERIAL INYO LAKE LASSEN MADERA MARIPOSA MENDOCINO
MERCED MODOC MONO NAPA NEVADA PLACER PLUMAS SAN BENITO SHASTA SIERRA SISKIYOU SUTTER TEHAMA TRINITY TULARE TUOLUMNE YOLO YUBA

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landowners are able to utilize the Exemption to create meaningful change benefit to the landscape and threat to catastrophic wildfire.

The Board must create a viable solution for the increased widespread forest fuel-reduction projects for the betterment of the environment and the protection of communities. The Pilot Project must be as functional and economically affordable as possible to landowners to encourage participation. For these reasons, we strongly encourage the Board to adopt the proposed revisions to the Pilot Project Exemption that have been noticed in the 15-day Notice and to request that CalFIRE provide annual reports on its effectiveness. Thank you for considering our comments, and we encourage you to contact us if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Staci Heaton", with a stylized flourish at the end.

STACI HEATON
Regulatory Affairs Advocate

cc: Members of the California Board of Forestry and Fire Protection
George Gentry, California Board of Forestry and Fire Protection
Kevin Conway, California Board of Forestry and Fire Protection
RCRC Board of Directors